

**IN THE UNITED STATES  
DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA**

**UNITED STATES OF  
AMERICA,**

**V.**

**JAMICA DELWAN LAWSON,  
DEFENDANT.**

**CASE NUMBER**

**2:07-CR-95WHA**

**MOTION TO CONTINUE  
SENTENCING HEARING**

**COMES NOW** the defendant, Jamica Delwan Lawson, by and through the undersigned counsel and moves this Honorable Court to continue his Sentencing Hearing currently set for March 20, 2008 by stating the following:

1. Defendant's sentencing is currently set for March 20, 2008 at 10:00 a.m.
2. Counsel filed a motion to obtain transcripts of the Bond Revocation Hearings and this Court issued its order granting said motion. Issues raised during the bond revocation hearing will be disputed at sentencing.
3. Counsel received the transcripts of said hearings on March 7, 2008 and March 11, 2008. Immediately after receipt of the aforementioned transcript, Defense counsel reviewed the transcript for information, among other things, that would provide the address of a witness that testified at the hearing. Prior to receipt of the transcript, Defense counsel request of counsel for the Government that the U. S. Government make their witness available for the sentencing hearing and Defense counsel did not receive an affirmative answer to the request.

4. Counsel for the Defendant, Ms. Clark Morris, AUSA, Ellen Traywick, P.O. and Scott Wright, P.O. meet on March 12, 2008 to discuss sentencing issues and to hopefully resolve these issues. Following this meeting the sentencing issues remain unresolved.

5. During the above meeting Defense counsel again requested that the attorney for the Government make the witness available for the sentencing hearing and Defense counsel was informed that the Government would not make the witness available and the Defendant would have to subpoena said witness.

6. Counsel for the Defendant has over the past week requested that the Government again produce this witness for the sentencing hearing and learned on, March 12, 2008, that the Government will not produce this witness and require the Defendant to subpoena said witness.

7. As of this writing, the Defendant is without an address for this witness to facilitate a subpoena.

8. The issue unresolved and of concern to the Defendant is the alleged obstruction of justice. This issue will have an adverse result to the Defendant's offense level denying him his three (3) level downward departure for acceptance of responsibility and increasing his offense level by two (2) pursuant to *U.S.S.G. § 3C1.1* for obstruction of justice.

**WHEREFORE, THE PREMISES CONSIDERED,** Defendant prays that this Honorable Court will grant the foregoing and continue the Defendant's sentencing hearing to allow the Defendant sufficient time to locate the requested witness and subpoena her.

**RESPECTFULLY SUBMITTED** this the 14th day of March, 2008.

/s/ Daniel G. Hamm

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## CERTIFICATE OF SERVICE

I hereby certify that I electronically filed this Motion to Continue Sentencing Hearing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following: A. Clark Morris, Assistant United States Attorney, Post Office Box 197, Montgomery, Alabama 36101-0197.

**DONE** this the 14th day of March, 2008.

/s/ Daniel G. Hamm

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